



John MacDonald, Partner & Office Head
Cybersecurity & Data Privacy Team
3120 Princeton Pike, Suite 301
Lawrenceville, NJ 08648
jmacdonald@constangy.com
609.454.0096

June 14, 2024

BY ECF

Honorable Harvey Bartle III, U.S.D.J.
United States District Court
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

Re: *Atlas Data Privacy Corporation, et al v. Restoration of America, et al*
Case No. 1:24-cv-4324
Joinder in Defendants' Consolidated Motion to Dismiss Plaintiffs' Complaint

Dear Judge Bartle:

This firm represents the defendants Restoration of America and Voter Reference Foundation LLC (“Defendants”) in the above-referenced matter. We write to advise the Court that Defendants join the Consolidated Motion to Dismiss Brief, which was filed in the action captioned as *Atlas Data Privacy Corporation, et al. v. Costar Group, Inc., et al.*, Civil Action No. 1:24-cv-4111 (the “Consolidated Motion to Dismiss”). For the reasons set forth in the Consolidated Motion to Dismiss, Defendants respectfully request that the Court grant the motion and dismiss Plaintiffs’ Complaint in this matter with prejudice.

Respectfully submitted,

/s/ John E. MacDonald

John E. MacDonald
Partner & Office Head, Cybersecurity & Data Privacy Team

Alabama Arkansas California Colorado District of Columbia Florida Georgia Illinois
Indiana Maryland Massachusetts Minnesota Missouri New Jersey New York
North Carolina Oregon Pennsylvania South Carolina Tennessee Texas Virginia Washington